

'They will soar on wings like eagles ...'

Isaiah 40:31



collaborate | enrich | trust | innovate | aspire | nurture

Multi Academy Trust Policy

Common Trust Policy, Use as Published

Modern Slavery and Human Trafficking Statement

Date adopted by Trust Board: 02/2023

Date of Review: 01/2025

Date of next Review: 02/2027

Version	Date	Author	Change Description
V.1	30/01/2025	T.Howard	Update of employees and financial year

Introduction

Aquila, The Diocese of Canterbury Academies Trust was established under the Academies Act 2010. We are a company limited by guarantee and an exempt charity, the memorandum and articles of association are our primary governing documents. We employed up to 677 direct employees during the 2023/24 financial year, working in 16 schools all based in Kent.

Our Trustees are also the directors for the purposes of company law. The Trustee Board of Aquila is aware of the company's obligations under the Modern Slavery Act 2015. Trustees are also aware that it is their responsibility to ensure that the company and its officers comply with this and all other relevant company, charity, employment, education, safety and environmental legislation.

This statement sets out the actions that have been, and will be, taken by the Trust to meet its obligations under the Modern Slavery Act 2015.

This policy is written with our trust ethos and values at its heart and particularly our values of collaborate, trust and nurture.

What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors and suppliers, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including:

- Employees at all levels
- Members, Trustees and Local Governors
- Agency workers
- Seconded workers
- Volunteers
- Interns and Apprentices
- Contractors
- External consultants
- Third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Our Values

The Trust's values of Collaborate, Enrich, Trust, Innovate, Aspire and Nurture provide the context of a zero-tolerance position on violations of human rights and modern slavery laws. Our values underpin how we operate and are embedded throughout our processes and systems.

We seek to treat everyone fairly and consistently, creating a workplace and environment that is open, transparent and trusted.

Our policies

We have a number of policies and procedures in place that contribute to ensuring modern slavery does not occur in our schools or supply chains. These are as follows:

- Child Protection Policy & Safeguarding
- Equality Statement
- Finance and Controls Policy
- Recruitment & Selection Policy
- Competitive Tendering
- Whistleblowing Policy

As a result of these policies and their consistent application, the general risk of the Trust engaging in Modern Slavery via its internal mechanisms is currently very low. Our recruitment and safeguarding procedures are such that victims would be identified and appropriate actions taken to support and protect them.

We are evolving and updating our procurement and contracting processes to include specific prohibitions against the use of forced, compulsory and trafficked labour, or anyone held in slavery or servitude, whether adults or children.

Transparency in our supply chains

The greatest risk to the trust is when dealing with its suppliers. Our suppliers are predominantly based in the United Kingdom and include the following services and provisions

- Education equipment, textbooks and resources
- Student uniform suppliers
- Estate maintenance services and capital works
- ICT equipment and services
- Catering services and supplies
- Cleaning services and supplies
- Supply/agency staff.

Whilst we cannot 100% guarantee supplier adherence with the requirements of the Modern Slavery Act we will endeavour to eliminate the risks as much as possible. We will do this by ensuring that our procurement processes, supplier code of conduct and contractual terms include specific provision relating to the Modern Slavery Act.

Employee training

All trust staff have received training in Part 1 of Keeping Children Safe in Education, which includes reference to child criminal exploitation. However, we want to help our staff and pupils to understand more about this growing issue across all areas of our work.

We want staff to know how to report any suspicions they may have, whether in a business or personal context and will look at how we can build this appropriately into our curriculum. Staff will also be made aware of [modernslavery.gov.uk](https://www.modernslavery.gov.uk), which holds useful information on how to recognise different types of slavery, how to spot the signs and provides details of a how to report suspected cases.

Reporting knowledge or suspicion of slavery

We have a robust and transparent whistleblowing policy which ensures that anyone who has concerns has a means of raising those confidentially.